

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

TRICORE, INC.

VS.

SAFECO INSURANCE COMPANY OF  
AMERICA and R.P. IANNUCCILLO &  
SONS CONSTRUCTION CO.


CIVIL ACTION NO.  
04-12393 (MLW)

MAY 25, 2005

**MOTION FOR MORE DEFINITE STATEMENT**

Pursuant to Rule 12(e) of the Federal Rules of Civil Procedure, the Cross Claim Defendant, Safeco Insurance Company of America, hereby moves for a more definite statement of the Cross Claim filed by the Defendant, R.P. Iannuccillo & Sons Construction Co., on the grounds that the allegations contained therein are vague, ambiguous, and/or fail to separately set forth each factual allegation and legal claim by the Cross Claim Plaintiff. In support of this motion, the Cross Claim Defendant submits the attached Memorandum of Law.

CROSS CLAIM DEFENDANT,  
SAFECO INSURANCE COMPANY  
OF AMERICA

By   
Dennis C. Cavanaugh  
Brown Raysman Millstein Felder &  
Steiner LLP  
Its Attorneys


**CERTIFICATION**

This is to certify that on May 25, 2005, a copy of the foregoing was mailed, postage pre-paid or delivered electronically or by facsimile to the following:

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